

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

DEARREA KING,

Plaintiff,

v.

CITY OF COLUMBUS, OHIO, et al.,

Defendants.

Case No. 2:18-cv-1060

Judge Edmund A. Sargus

Magistrate Judge Elizabeth Preston Deavers

**STIPULATIONS RE  
WILLIAM SCOTT**

Plaintiff Dearrea King, Defendant City of Columbus, Defendant Bryan Mason, Third-Party Defendant Jaronn Collins, and Third-Party Defendant PR (a minor) hereby stipulate and agree that the following states are true for any and all purposes relevant to this civil action:

1. On March 22, 2019, Plaintiff Dearra King produced, among other things, an audio file named “Williamscott101216” to Defendants City of Columbus and Bryan Mason during discovery in this matter. It is an M4A file of about 49,085 kilobytes, and the audio recorded therein lasts about 51 minutes and 24 seconds.
2. On May 28, 2019, Defendants City of Columbus and Bryan Mason produced, among other things, an audio file named “PLNT Audio 6 - Scott, William 16101216” to Plaintiff Dearrea King, Third-Party Defendant Jaronn Collins, and Third-Party Defendant PR (a minor) during discovery in this matter. It is an M4A file of about 49,085 kilobytes, and the audio recorded therein lasts about 51 minutes and 24 seconds.
3. Despite having different names, the audio files describe above are the same, and they are both a true and accurate recording of a conversation between William Scott and Cerise Allen that was conducted in October of 2016. The parties will refer to the audio files simply as the “Scott Audio.”
4. The Scott Audio was played for William Scott during his August 21, 2019 deposition in this civil action. The version of the Scott Audio that was played for Mr. Scott was neither altered nor edited from the identical versions named either “Williamscott101216” or “PLNT Audio 6 - Scott, William 16101216.”
5. The statements made by Mr. Scott in the Scott Audio are statements that Mr. Scott actually made to Cerise Allen in October of 2016.

So stipulated,

/s/ S.K.W. \*

Sean L. Walton (0088401) – Trial  
Chanda L. Brown (0081076)  
WALTON + BROWN, LLP  
395 East Broad Street, Suite 200  
Columbus, Ohio 43215  
(614) 636-3476 / (614) 636-3453 (fax)  
[swalton@waltonbrownlaw.com](mailto:swalton@waltonbrownlaw.com)  
[cbrown@waltonbrownlaw.com](mailto:cbrown@waltonbrownlaw.com)

Attorneys for Plaintiff Dearrea King

\* By ADMM per email authority granted 11/14/19

So stipulated,

/s/ J.M. \*\*

J.B. Hadden (0059315) – Trial  
Jonathan Misny (0090673)  
MURRAY MURPHY MOUL + BASIL, LLP  
1114 Dublin Road  
Columbus, Ohio 43215  
(614) 488-0400 / (614) 488-0401 (fax)  
[hadden@mmmb.com](mailto:hadden@mmmb.com)  
[misny@mmmb.com](mailto:misny@mmmb.com)

Attorneys for Third-Party Defendant Jaronn Collins

\*\* By ADMM per email authority granted 11/14/19.

So stipulated,

/s/ A.D.M. Miller (11/18/19)

Andrew D.M. Miller (0074515) – Trial  
Westley M. Phillips (0077728)  
Assistant City Attorneys  
CITY OF COLUMBUS, DEPARTMENT OF LAW  
ZACH KLEIN, CITY ATTORNEY  
77 North Front Street, 4th Floor  
Columbus, Ohio 43215  
(614) 645-7385 / (614) 645-6949 (fax)  
[admmiller@columbus.gov](mailto:admmiller@columbus.gov)  
[wmphillips@columbus.gov](mailto:wmphillips@columbus.gov)

Attorneys for Defendant

So stipulated,

/s/ P.W.R. \*\*\*

Alycia N. Broz (0070205) – Trial  
Angelyne E. Lisinski (0089699)  
Sarah Spector Boudouris (0093909)  
P. Wilson Reiser (0095545)  
Arryn K. Miner (0097725)  
VORYS, SATER, SEYMOUR AND PEASE LLP  
52 East Gay Street, PO Box 1008  
Columbus, Ohio 43215  
(614) 464-5616 / (614) 719-4963 (fax)  
[anbroz@vorys.com](mailto:anbroz@vorys.com)  
[aelisinski@vorys.com](mailto:aelisinski@vorys.com)  
[ssboudouris@vorys.com](mailto:ssboudouris@vorys.com)  
[pwreiser@vorys.com](mailto:pwreiser@vorys.com)  
[akminer@vorys.com](mailto:akminer@vorys.com)

Attorneys for Third-Party Defendant PR (a minor)

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